

Gentlemen:

Tulsair Beechcraft has operated charter for over 50 years. We are currently flying charter in a Lear 25 that due to the engine times and equipment would normally be worth about \$1 Million. Since the announcement of RVSM we cannot sell the aircraft which we have been trying to accomplish for over 18 months. Purchasers are only considering the value of the airplane to be whatever its usage can be until December 2004. This drops the value to somewhere between \$100,000 and \$150,000....maybe!! This is too severe of an economic impact for operators of these airplanes. The 20 series Learjets are a mainstay of jet charter operators. Besides the severe economic impact that all these operators will experience, a tremendous amount of service will be lost to the flying public.

It seems to me that the simple answer would be to allow these aircraft to transit through the RVSM altitudes but cap the RVSM at FL370. The 20 series airplanes for maximum range operate at FL390 and FL410. The current proposal for FL430 and above would be impossible except for the last 10 minutes before descent when the fuel weight in the aircraft had been reduced. Although some facilities have considered trying to adapt the 20 series aircraft for RVSM, it is the industry conclusion that the aircraft cannot be adapted for RVSM for a price that would be feasible when considering the value of the aircraft. Surely the loss of the highest 4000 feet of RVSM altitude could not be that serious to the aircraft that might operate within that area under RVSM rules. My suggestion would be a very simple solution and save the severe economic impact to the operators plus the loss of inexpensive air charter operations to the public.